

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

1 <sup>st</sup> SIGNATURE LENDING LLC	)	
	)	
Plaintiff,	)	
	)	CASE NO.: 1:20-cv-02130-JMS-MPB
v.	)	
	)	
BRIGHTON BANK,	)	
	)	
Defendant.	)	

**BRIGHTON BANK’S MOTION TO TRANSFER VENUE**

Defendant, Brighton Bank (“Brighton”), by counsel, respectfully moves this Court to transfer this cause to the United States District Court for the Western District of Tennessee, pursuant to 28 U.S.C. § 1404(a), as required by the forum selection clause in Section 25 of the “Brighton Bank Correspondent Loan Purchase Agreement” attached to Plaintiff 1<sup>st</sup> Signature Lending, LLC’s (“Plaintiff”) Complaint as Exhibit 1 [Filing No. 1-1, p. 20, § 25 (“The parties agree that the sole proper venue for the determination of any litigation commenced by ... [Plaintiff] against [Brighton] on any basis shall be in a court of competent jurisdiction which is located in Tipton County, Tennessee or the Western District of Tennessee, and the parties hereby expressly declare that any other venue shall be improper and each party expressly waives any right to a determination of any such litigation by a court in any other venue.”).]

In support of this motion, Brighton hereby tenders its Brief In Support of Motion to Transfer Venue, which it is filing contemporaneous herewith and which is incorporated herein in its entirety.

A proposed order granting this Motion to Transfer Venue is attached hereto as **Exhibit 1**.

WHEREFORE, Defendant, Brighton Bank, by counsel, respectfully requests that the Court GRANT this Motion to Transfer Venue, and transfer venue of this cause to the United States District Court for the Western District of Tennessee pursuant to 28 U.S.C. § 1404(a) and Section 25 of the “Brighton Bank Correspondent Loan Purchase Agreement”; and grant all other appropriate relief.

Respectfully submitted,

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/s/ Ryan J. Vershay

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### **CERTIFICATE OF SERVICE**

I hereby certify that on September 17, 2020, a copy of the was filed electronically. Service of this filing will be made on all ECF-registered counsel by operation of the court's electronic filing system. Parties may access this filing through the court's system.

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